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July 23, 2010

**Via ECF**

The Honorable J. Frederick Motz  
United States District Court Judge  
for the District of Maryland  
Baltimore Division  
101 W. Lombard Street  
Baltimore, MD 21201

Re: Brent Boyd v. Bert Bell/Pete Rozelle NFL Player Retirement Plan  
U.S. D. Md. Case No. 10-cv-360-JFM

Dear Judge Motz:

Per the Court's June 14, 2010 Order, Mr. Brent Boyd and the Bert Bell/Pete Rozelle NFL Player Retirement Plan ("Plan") are required to report on the status of discovery and propose a schedule for this proceeding.

This matter arises under the Employee Retirement Income Security Act of 1974 ("ERISA"). The parties disagree as to the propriety of discovery, but appreciate the necessity of making good faith efforts to avoid a discovery dispute. The Plan has produced the administrative record and Plan document, and the Minnesota Vikings have responded to a non-party subpoena issued by Mr. Boyd. The parties have recently agreed to an additional exchange of information in an effort to avoid a discovery dispute. Accordingly, by agreement of the parties, the Plan shall file any necessary request for a protective order by no later than August 31, 2010. The parties anticipate the filing of dispositive motions by approximately two months from the completion of the above-referenced matters, and the undersigned shall take responsibility for contacting Mr. Boyd's counsel in order to arrange an appropriate briefing schedule and report it to the Court.

Mr. Boyd and the Plan thank the Court for its consideration of these matters and are available for discussion upon the Court's requests.

Respectfully,  
/s/  
Hisham M. Amin

Cc: Mark D. DeBofsky, Esq., *via* ECF  
Richard P. Neuworth, Esq. *via* ECF